

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CORINE TERMONIA,)
)
Plaintiff,) C.A. No.: 06-294 (SLR)
v.)
)
BRANDYWINE SCHOOL) TRIAL BY JURY DEMANDED
DISTRICT,)
)
Defendant.)

NOTICE OF 30(b)(6) DEPOSITION DUCES TECUM¹

TO: Barry M. Willoughby, Esquire
Young, Conaway, Stargatt & Taylor, LLP
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899

PLEASE TAKE NOTICE, that pursuant to the provisions of Rule 30(b)(6),
Federal Rules of Civil Procedure, the defendant, is to designate the appropriate
personnel to testify on the subject matter identified in the attached Exhibit A to be taken
on July 10, 2008 beginning at 9:30 a.m. at the offices of Aber, Goldlust, Baker & Over,
Suite 600, First Federal Plaza, 702 King Street, Wilmington, DE 19801.

ABER, GOLDLUST, BAKER & OVER

/s/ Gary W. Aber
GARY W. ABER (DSB #754)
First Federal Plaza, Suite 600
702 King Street, P.O. Box 1675
Wilmington, DE 19899
302-472-4900
Attorney for Plaintiff

DATED: July 2, 2008

¹ The witness is to produce all documents in support of, pertaining to, or relevant to the topics listed in Exhibit A.

EXHIBIT A

1. The qualifications of the successful applicant for the position of Assistant Principal with the Talley Middle School, appointed in August 2003, being Gwendolyn James, for that position.
2. All the reasons and rationales why the plaintiff was not selected for the position listed in Item No. 1.
3. The qualifications of the successful applicant for the position of Assistant Principal with the Brandywine High School, appointed in April 2004, being Cordie Greenlea, for that position.
4. All the reasons and rationales why the plaintiff was not selected for the position listed in Item No. 3.
5. The qualifications of the successful applicant for the position of Assistant Principal with the Concord High School, appointed in April 2004, being Anne Lambert, for that position.
6. All the reasons and rationales why the plaintiff was not selected for the position listed in Item No. 5.
7. The qualifications of the successful applicant for the position of Assistant Principal with the P.S. DuPont Elementary School, appointed in June 2004, being James Simmons, for that position.
8. All the reasons and rationales why the plaintiff was not selected for the position listed in Item No. 7.

9. The qualifications of the successful applicant for the position of Assistant Principal with the Mount Pleasant High School, appointed in the Summer of 2004, being Marqueia Davis, for that position.
10. All the reasons and rationales why the plaintiff was not selected for the position listed in Item No. 9.
11. The qualifications of all successful applicants for pool positions in 2003.
12. All the reasons and rationales why the plaintiff did not receive any of the pool positions for 2003.
13. The qualifications of all successful applicants for pool positions in 2004.
14. All the reasons and rationales why the plaintiff did not receive any of the pool positions for 2004.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the attached pleading was electronically filed via Pacer and by hand delivery on July 2, 2008 to the following counsel:

Barry M. Willoughby, Esquire
Young, Conaway, Stargatt & Taylor, LLP
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899

/s/ Melissa A. Chionchio

Melissa A. Chionchio
Secretary to Gary W. Aber, Esquire